UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SCANSOFT, INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 04-10353-PBS
	)	
	)	
VOICE SIGNAL TECHNOLOGIES, INC.,	)	
LAURENCE S. GILLICK, ROBERT S.	)	
ROTH, JONATHAN P. YAMRON, and	)	
MANFRED G. GRABHERR,	)	
	)	
Defendants.	)	
	)	

VOICE SIGNAL TECHNOLOGIES, INC.'S SUBMISSION
IN ACCORDANCE WITH THE COURT'S MAY 24, 2006 ORDER

Voice Signal submits this memorandum pursuant to the Court's statements during the

May 23, 2006 hearing and its Order dated May 24, 2006, requiring Voice Signal to "designate

six of its patent claims that ScanSoft has allegedly infringed."

Voice Signal designates claims 7, 14 and 16 of U.S. Patent No. 6,594,630 (the "'630

Patent"). Within those three claims, Voice Signal designates the following five claim elements

(some of which are found in more than one claim) upon which the Neutral Expert should focus

when examining the ScanSoft source code. The Neutral Expert should ask whether there is

reason to believe that the accused ScanSoft voice recognition engine:

1. records and receives speech recognition data and audio inputs that have a command word portion and a pause portion, *each of the speech recognition data/audio portions being at least one syllable in length* [Claim 7, 14, 16]

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2. receives at least one audio command, which audio command has a first and second command word portion and a first, second and third pause portion, *each of the audio command portions being at least one syllable in length* [Claim 16]

3. generates a signal based upon a comparison of the received audio to the recorded data, which signal enables an application to generate a control signal [Claim 7, 14, 16]

4. analyzes the pause portion of the received audio command for spectral content [Claim 7, 14]

5. compares the energy content for the command word portion to the energy content for received background noise and generate an energy comparison value [Claim 14]

Further in accordance with the Court's May 24, 2006 Order, Voice Signal's independent expert will, on or before July 26, 2006, submit to the Court and to the Neutral Expert a report identifying the portions of ScanSoft's source code which establish that there is reason to believe that these elements of claims 7, 14 and 16 of the '630 Patent are present in the ScanSoft source code.

Respectfully submitted,

Dated: May 26, 2006.   VOICE SIGNAL TECHNOLOGIES, INC.

By its attorneys,

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